

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WILMINGTON DIVISION

In re: TSR LLC,

Debtor.

Case No.: 23-01577-5-DMW

DECLARATION OF LAUREN RAINWATER IN SUPPORT OF WIZARDS OF THE
COAST LLC'S MOTION FOR CONFIRMATION THAT THE AUTOMATIC STAY DOES
NOT APPLY OR FOR RELIEF FROM THE AUTOMATIC STAY

I, Lauren Rainwater, declare as follows:

1. I am an attorney at Davis Wright Tremaine LLP and counsel for Wizards of the Coast LLC in *TSR LLC v. Wizards of the Coast LLC*, Case No. 2:21-cv-01705-SKV (W.D. Wash.). This declaration is made in support of Wizards' Motion for Confirmation that the Automatic Stay Does Not Apply or, in the Alternative, for Relief from the Automatic Stay. I am in all ways competent to make this declaration, and I do so on the basis of personal knowledge.

2. I have attached as **Exhibit A** a true and correct copy of the Protective Order entered on November 4, 2022, in *TSR LLC v. Wizards of the Coast LLC*, Case No. 2:21-cv-01705-SKV (W.D. Wash.). At the Western District of Washington court's direction, Wizards drafted and the parties ultimately stipulated to a protective order governing the parties' conduct toward witnesses, after third-party subpoena recipients were harassed in connection with their participation in the litigation.

3. I have attached as **Exhibit B** a true and correct copy of website screenshots of donosemora.com captured by my law firm on June 15, 2023. At the time of this declaration, the web address redirects to the Calhoun County, Michigan, Corrections Division website, https://www.calhouncountymi.gov/departments/sheriffs_office/jail.php.

4. I have included as **Exhibit C** Facebook screenshots provided by Don Semora on June 15, 2023, showing Mr. LaNasa disparaging Mr. Semora.

5. I have included as **Exhibit D** a true and correct copy of letter correspondence sent on June 20, 2023, to TSR LLC's counsel Algernon Butler III regarding Mr. LaNasa's violations of the protective order. I have omitted from this copy of the letter exhibits A and C enclosed with it, as the materials contained in those exhibits are already attached as Exhibit A, Exhibit B, and Exhibit C to this declaration.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

DATED this 14th day of July, 2023.

A handwritten signature in cursive script, reading "Lauren Rainwater", positioned above a horizontal line.

Lauren Rainwater

Exhibit A

The Honorable S. Kate Vaughan

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TSR LLC,

Plaintiff,

v.

WIZARDS OF THE COAST LLC,

Defendant.

Case No. C21-1705-SKV

**STIPULATED [PROPOSED]
PROTECTIVE ORDER
GOVERNING CONDUCT**

WIZARDS OF THE COAST LLC,

Counterclaim Plaintiff,

v.

TSR LLC; JUSTIN LANASA; and
DUNGEON HOBBY SHOP MUSEUM LLC,

Counterclaim Defendants.

1. PURPOSES AND LIMITATIONS

This Stipulated Protective Order Governing Conduct ("Protective Order") addresses conduct regarding witnesses in this case, including third-party subpoena recipients, witnesses subject to deposition or examination at trial, and any other person who may have or be perceived to have information pertinent to the issues in this lawsuit, including the parties' claims and

STIPULATED PROTECTIVE ORDER GOVERNING
CONDUCT - 1
(Case No. C21-1705-SKV)

Davis Wright Tremaine LLP
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206.622.3150 main · 206.757.7700 fax

1 defenses (collectively, “Witnesses”), and the named parties to this case (collectively referred to as
2 a “Party” or “Parties”).

3 2. SCOPE

4 2.1 The protections conferred by this Protective Order cover the Parties and any Party’s
5 employees, agents, representatives, family members, or other persons acting under the Parties’
6 direction or control.

7 2.2 Witnesses who fit the descriptions in Paragraph 2.1 are covered by this Protective
8 Order.

9 2.3 This Protective Order is entered in addition to the Stipulated Protective Order
10 agreed to by the Parties and entered by this Court at Dkt. 27. The Stipulated Protective Order
11 remains in full effect with respect to the subjects it addresses.

12 3. CONDUCT REGARDING WITNESSES AND PARTIES

13 3.1 Basic Principles. The full litigation of disputes on the merits requires truthful and
14 open testimony by those individuals with knowledge of facts relevant to a case. It also requires
15 cooperation of both Parties and non-party Witnesses who have information, documents, or other
16 materials subject to discovery. While parties in litigation retain their First Amendment rights, their
17 rights regarding the issues before the Court are constrained by the Court’s pursuit of truth and the
18 just resolution of disputes. Speech that interferes with this pursuit by harassing, intimidating,
19 pressuring, or otherwise improperly attempting to influence Witnesses or a Party is not permitted.
20 Ordinary and good faith conduct of litigation, including motions practice, depositions, and public
21 statements in the regular course of litigation, does not fall within the conduct proscribed by this
22 Protective Order.

23 3.2 Comments Regarding Witnesses. No Party may engage in any direct or indirect
24 conduct to improperly influence testimony or participation in this lawsuit.

25 ///

26 ///

27 ///

STIPULATED PROTECTIVE ORDER GOVERNING
CONDUCT - 2
(Case No. C21-1705-SKV)

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1 This includes, but is not limited to:

- 2 • any public, limited audience, or private statements intended to or likely to have the
3 effect of harassing, intimidating, threatening, or otherwise improperly influencing
4 Witnesses or a Party in this litigation;
- 5 • the actual or threatened dissemination of any personal information about Witnesses
6 or a Party, including information of a personal nature regardless of whether it may
7 be available in the public domain;
- 8 • use of a Witness's or a Party's name or likeness in a derogatory or harassing
9 manner;
- 10 • false and intentionally harassing reports to law enforcement about a Witness or a
11 Party;
- 12 • solicitation, encouragement, or suggestion for others to perform any conduct barred
13 by this Protective Order; and
- 14 • any other behavior intended to or likely to have the effect of improperly influencing
15 a Witness or a Party.

16 3.3 Applicable Forums. The restrictions in Paragraph 3.2 apply to traditional media,
17 email, blogs, public statements, chat rooms, and social media, including but not limited to
18 Facebook, YouTube, Discord, Twitter, EN World, and any other internet forum, or direct messages
19 on any such platforms. They also apply to limited-audience statements and other non-private
20 communications.

21 4. ENFORCEMENT

22 Any violation of this Protective Order shall be brought to the Court's attention. A Party
23 found to have directly or indirectly violated this Order may be subject to sanctions, including
24 without limitation attorneys' fees for the Party bringing the violation before the Court and any

25 ///

26 ///

27 ///

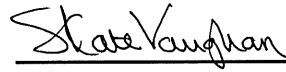
STIPULATED PROTECTIVE ORDER GOVERNING
CONDUCT - 3
(Case No. C21-1705-SKV)

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1 damages or expenses incurred by a Witness or a Party as a result of conduct barred by this
2 Protective Order.

3 [PROPOSED] IT IS SO ORDERED.

4 DATED: November 4th, 2022.

5 

6 S. KATE VAUGHAN
7 United States Magistrate Judge
8

9 *Stipulated to by:*

10 s/ Lauren B. Rainwater

11 Stuart R. Dunwoody, WSBA #13948
12 Lauren B. Rainwater, WSBA #43625
13 MaryAnn T. Almeida, WSBA #49086
14 Eric A. Franz, WSBA #52755
15 Rose McCarty, WSBA #54282
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22 Email: laurenrainwater@dwt.com
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25 Email: rosemccarty@dwt.com

26 *Attorneys for Wizards of the Coast*

27 s/ Dayna J. Christian

28 Dayna J. Christian, WSB #32459
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32 Phone: (503) 802-5533
33 Fax: (503) 802-5351
34 Email: dayna.christian@immixlaw.com

s/ Russell D. Nugent

Russell D. Nugent, *pro hac vice*
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Attorneys for Plaintiff and Counterclaim Defendants

STIPULATED PROTECTIVE ORDER GOVERNING
CONDUCT - 4
(Case No. C21-1705-SKV)

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Exhibit B

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User:	dwt-jimbudig



AVOID WIZARD TOWER GAMES

Owned and operated by Don O. Semora, Don't join the list of the scammed!

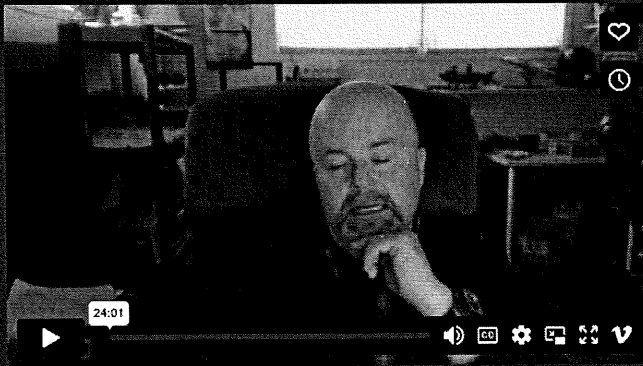
AKA WIZARD TOWER GAMES/2MOON PRESS/REPLICA FORGE

Check out this Tragic Story of damage caused by Don O. Semora.





DON O. SEMORA MODUS OPERANDI



Don O. Semora

Threatening & Doxing customers

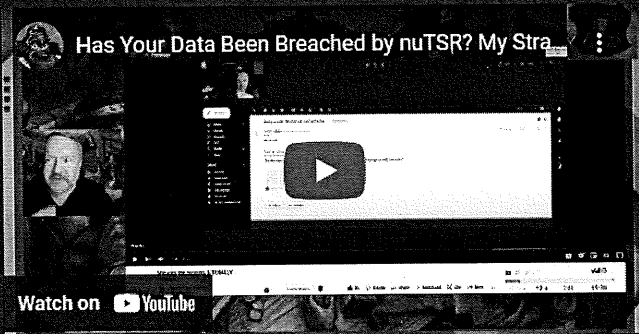
Don O. Semora

Threatening & Doxing customers part 2



Don O. Semora

Lie upon Lie's Even TSR's # 1 Hater Tenkar's Tavern has been Scammed, Misled & Lied to By Semora. Sounds like he knows it but still wants more sips of the Kool-Aid. Due to his hatred of TSR/Justin LaNassa



Consumer Protection

Please click the link below if you have been scammed, defrauded, or cheated out of products or services by Don O. Semora.



Consumer Protection

Please click the link below if you have been scammed, defrauded, or cheated out of products or services by Don O. Semora.

— FILE A REPORT HERE —

AVOID REPLICA FORGE Owned By Don O. Semora



Grifting at its finest

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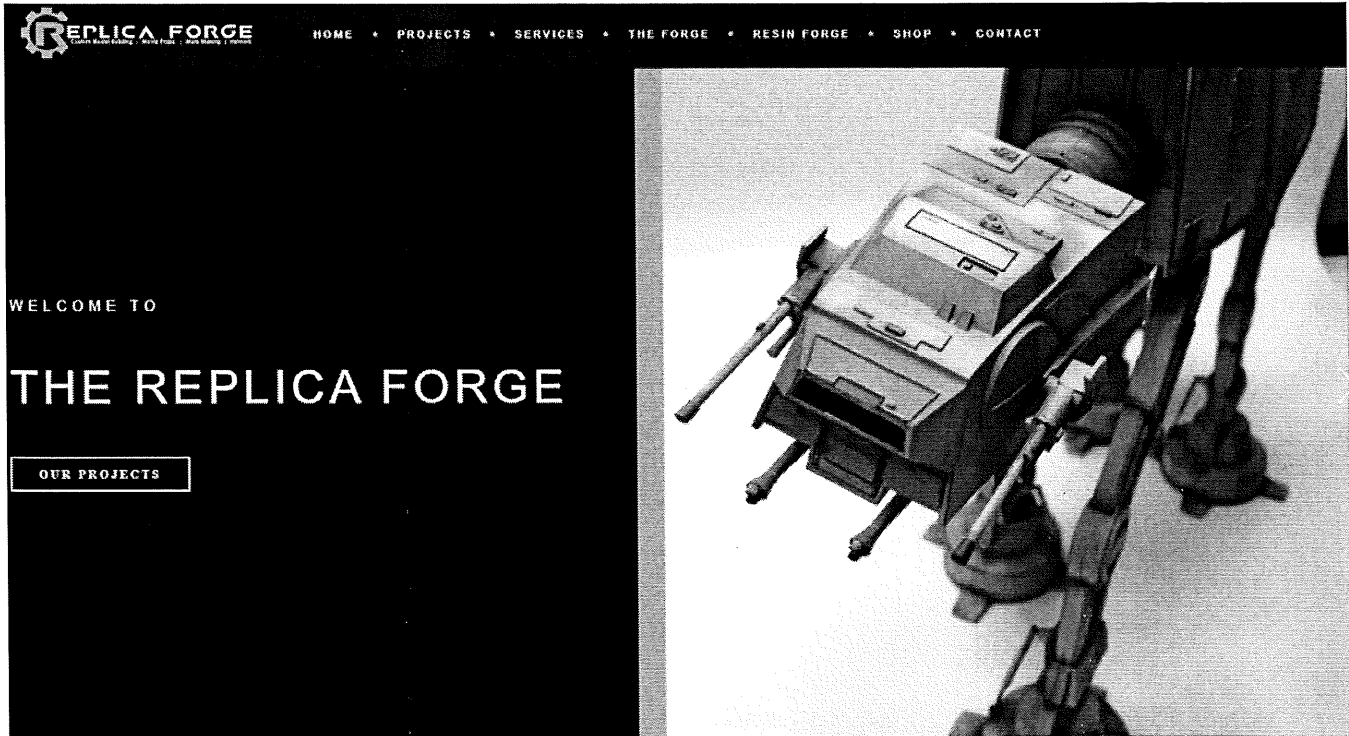
Have you been Scammed, Doxed, or have been Falsely accused by Don Semora

Email Address

— SIGN UP —



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User:	dwt-jimbudig

DON O. SEMORA HAS FORGED DOCUMENTS IN THE PAST



Semora loves to play the victim

What's very interesting is if you listen to what he accuses people of, he tells you what he is doing. Don Semora, where were you stationed? What was your MOS? What was your rank? NO service member talks about a DD214. That was possibly forged. Update

POW Network <info@pownetwork.org>

"Found NO service in any branch in the online database since 1985."

"Human Resources Command said they found no records either there in the repository or NPRC."



Attacks on Disney

Don O. Semora sure does have OPINIONS



Listen Closely to the Attacks on the Disabled



Attacks on Disney

Don O. Semora sure does have OPINIONS

Listen Closely to the Attacks on the Disabled

Don O. Semora speaks his mind about how the handicap slows his games down, and now they can play in a regular game now

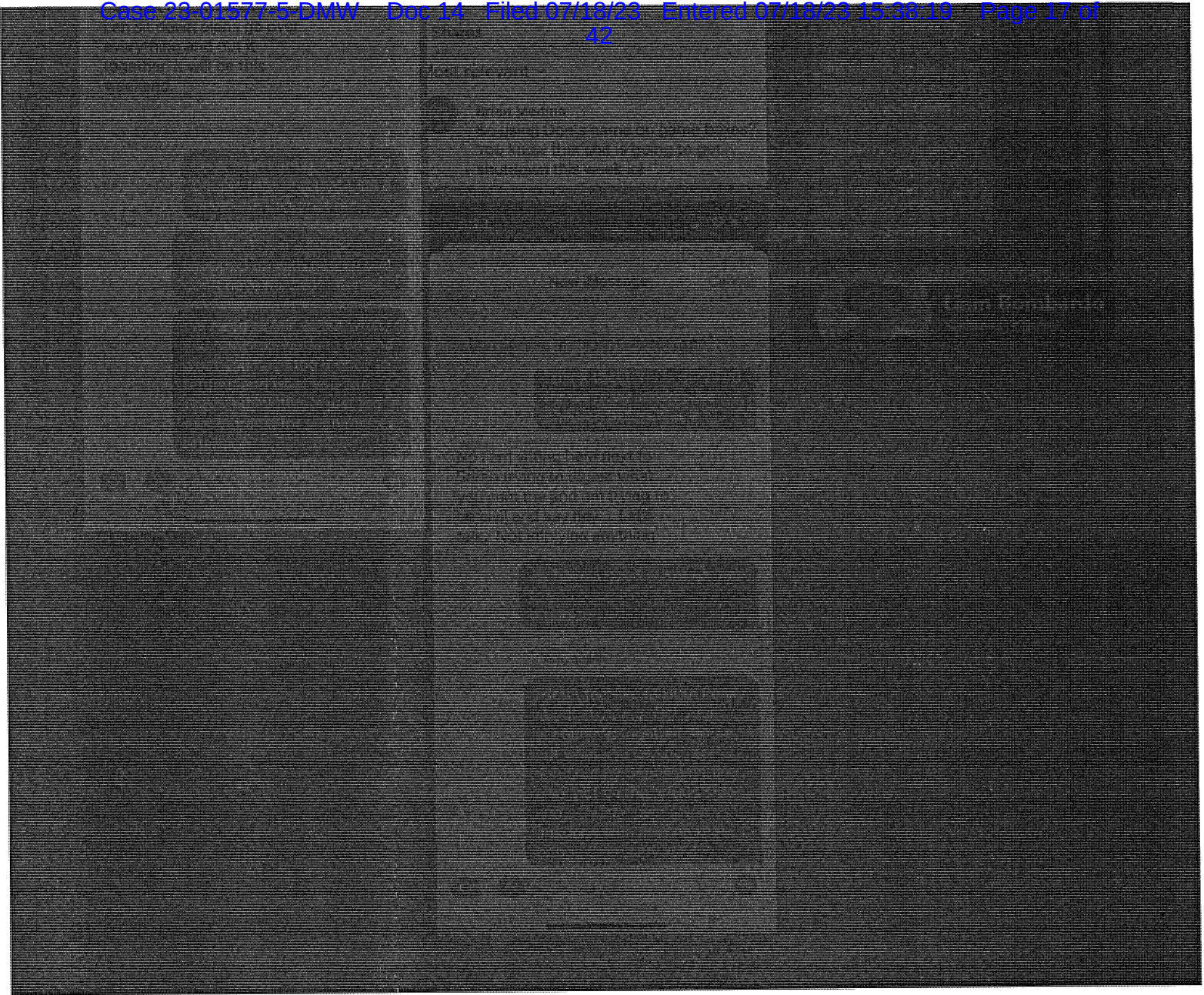
ALERT: DON SEMORA, "PROFESSIONAL DESIGNER AND AUTHOR" POSTED BY VICTORIA-STRAUSS FOR WRITER BEWARE®

Don Semora, whose brand-new website [styles him](#) a professional designer of book covers, games, websites, and more.

[— FIND OUT MORE —](#)

DON O. SEMORA HAS NUMEROUS FAKE ACCOUNTS





AVOID REPLICA FORGE Owned By Don O. Semora



Quick search



vaderperp
Member
RPF PREMIUM
MEMBER

Mar 21, 2023

Scammer alert!

Been a RPF member for a while but slowly making my way back into the hobby again. Think I may have been scammed by Don Semora of Replica Forge as well. Yeah I know I'm part of the blame for being so gullible but when you have two parents you're looking after due to illness time flies. Ordered a Bandai Falcon to be pro built last July. Going to see what my credit card company can do about my \$700. Below are my messages from Don as well. He also sent progress pics but I'm beginning to think they were stock photos of past projects. I'm posting them in case anyone else has received the exact same pics me.

Attachments



Grifting at its finest

— GO TO ALERT CLICK HERE —

Subscribe

Have you been Scammed, Doxed, or have been Falsely accused by Don Semora

Email Address

— SIGN UP —

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Operating system:	Windows_NT (Node 16.17.1)
PDF length:	8
Capture ID:	miRuqn78EHbe3NDSy1Vtdq
User:	dwt-jimbudig

DOWNLOADS 2 MOON PRESS COURT DOCS

2-Moon-Press-First-Amended-Complaint-2-1-1 (pdf)

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Deposition of Donald O. Semora (pdf)

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Plaintiff_s Brief In Support of MSD Pursuant t redacted (pdf)

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Don Court Ordered to make payments to authors (jpg)

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2011 Transactions (pdf)

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2012 Transactions (pdf)

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Jackson County Office of the Sheriff Detail (pdf)

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Don in Barry Court (pdf)

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Don speeding ticket (pdf)

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20220928 - Semora CHAT criminal history (pdf)

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DOWNLOADS WOTC VS TSR SEMORA'S FABRICATED LEAKS

ECF 31-1 - Order on Wizards Preliminary Injunction (pdf)

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ECF 31 - Wizards Motion for Preliminary Injunction (pdf)

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ECF 37 - Response to Motion for Prelim Inj 31p (pdf)

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ECF 38 - DJC Decl Iso Response to Motion for Prelim Inj's 118p (pdf)

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ECF 39 - LaNasa Decl Iso Response to Motion for Prelim Inj 572p (pdf)

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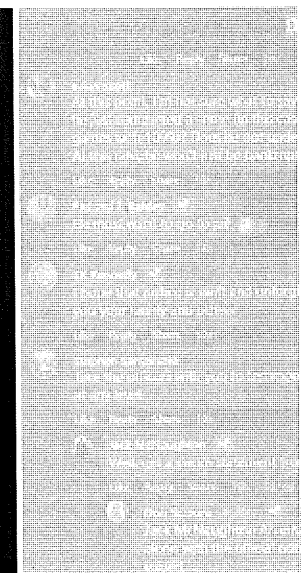
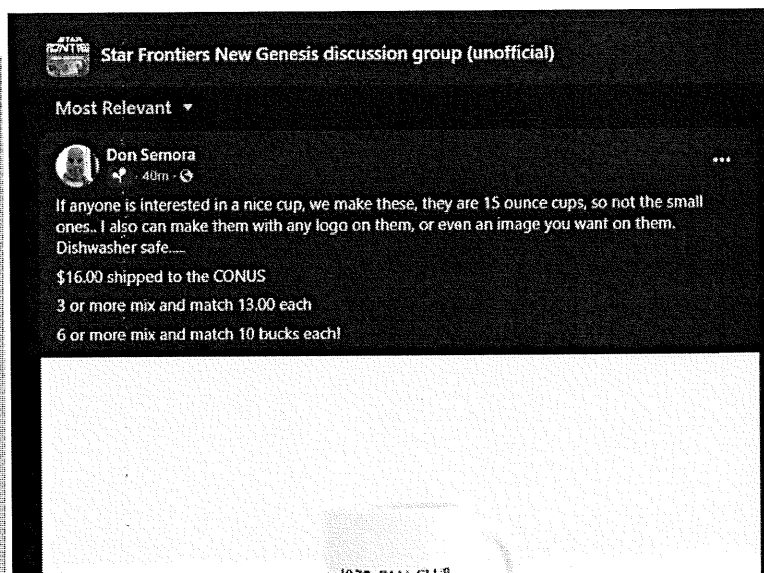
ECF 40 - Johnson Decl Iso Response to Motion for Prelim Inj 4p (pdf)

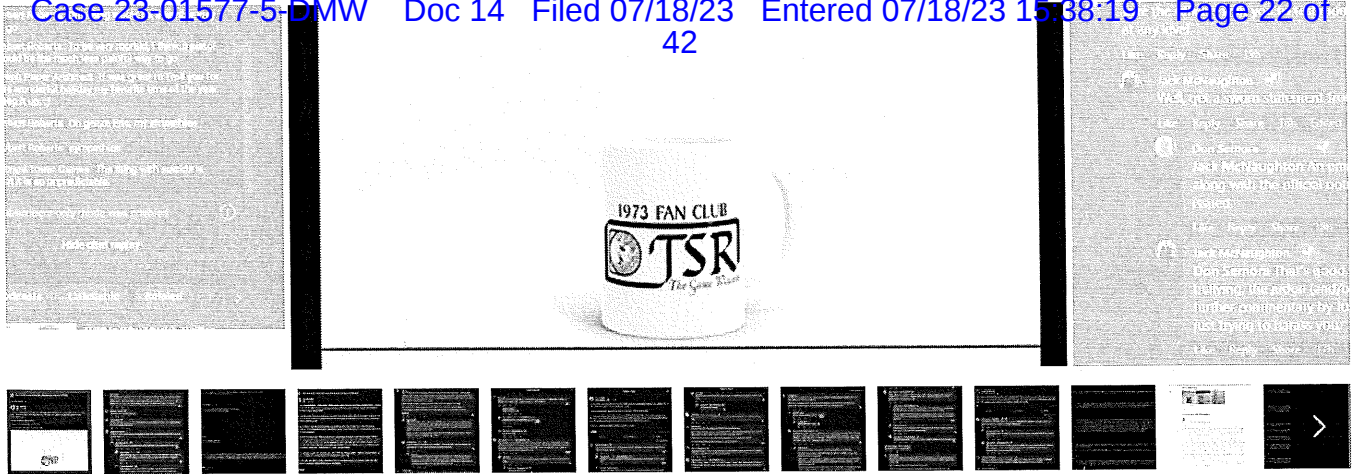
DOWNLOAD

ECF 51 - 20221214 Order on Injunction Motion (pdf)

DOWNLOAD

ATTACKS ON TSR AND ANYONE CONNECTED





DON SEMORA REVIEWS AND ATTACKS A GAME BY JUSTIN LANASA



Donald Semora "Well it has a familiar theme as their SFNG game that they claimed was photoshopped. Umimmm no it was not."



My review of Goblins: Those Pesky Goblins



REVIEWED BY

Don Semora

Watch on  YouTube

DON SEMORA RECENT KICKSTARTER SCAM

92 Backers scammed out of their money

The RPG in a box where you and friends try to
find the treasure and the treasure is not there

DON SEMORA RECENT KICKSTARTER SCAM

92 Backers scammed out of their money

Excuse Semora gives all his victims

- 1 Waiting on material chipboard
- 2 Material/Chipboard is held in customs
- 3 I am in the hospital /My daughter is in the hospital and in critical condition etc.
- 4 My store was broken into here are the pictures (Fake no police reports we checked)

The people you see collaborating with Don Semora are just as bad as he is. These folks are cut from the same cloth liars and thieves.

The screenshot shows the Kickstarter page for "D20: DELVING BOARD GAME". The header features the game title, a "Follow along!" button, and a description: "The RPG in a box where you and friends try to find the seven relics and make it out alive." It also mentions "Featuring Tim Kask's voice to make the game a more interactive and immersive experience." and includes a "LET'S DO THIS!" banner. The campaign status shows "\$10,233 of \$10,233 to go" and "92 backers". The page includes navigation links for Campaign, FAQ, Updates, Comments, and Community. At the bottom, there is a "Support" section with a "Pledge US\$ 1 or more" button and a "A Buck To Help Out!" link.

Comments

Only backers can post comments. Log in



Dan Harlan
29 days ago

Crazy how cardstock would be of any interest to Customs. Appreciate the update and your work at looking at alternatives. Not sure though if shipped games from China would get through Customs any faster than cardstock though :)



Wizard Tower Games **Creator**
29 days ago

I do not think it was my stock that was of interest. I was told that the container was "problematic" so I imagine it was something else within it that held up everyone else. This delay is why we went through the added cost and ordered also games direct.



Stephen **SuperBacker**
29 days ago

Thanks for the update

UPDATE #23

5-15-23 UPDATE



Wizard Tower Games **Creator**
May 15, 2023

Hello everyone! Sorry for not updating in a few weeks we have been busy here getting the web part of this project edited and made better. We know this project is late, we thought it would be a great idea to make it a "Made In House" project.

We as everyone knows have had delays over some customs issues with some of our materials. We were notified about a week or so ago our materials were being released, so that is great news. However as of a few moments ago the materials are not tracking to us yet. So we tomorrow will be going to customs and seeing if we cannot get with our import representative and see what is happening.

We as everyone knows have had delays over some customs issues with some of our materials. We were notified about a week or so ago our materials were being released, so that is great news. However as of a few moments ago the materials are not tracking to us yet. So we tomorrow will be going to customs and seeing if we cannot get with our import representative and see what is happening.

We do have the ability to have a manufacturer in China make these games, and as a safeguard on Friday I went ahead and ordered enough games from them to cover the Kickstarter and then some. We would prefer to make them ourselves but at this point we want out supporters to get their games. We hope we still can make them, but at the end of the day games in YOUR hands is more important. This is a very complicated and unique project and one that we know you will love once you get it.

The idea of having QR codes in games is one we plan to run with in other projects, this is our ice breaker project and one with Tim's voice will be something very special. We apologize for the lateness in this, we just wanted to do something special, and thanks to Customs it kind of backfired on us.

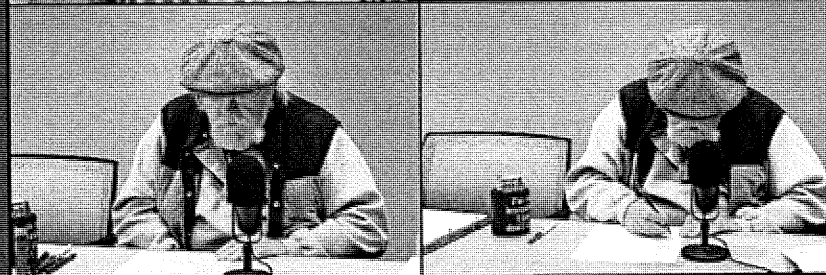
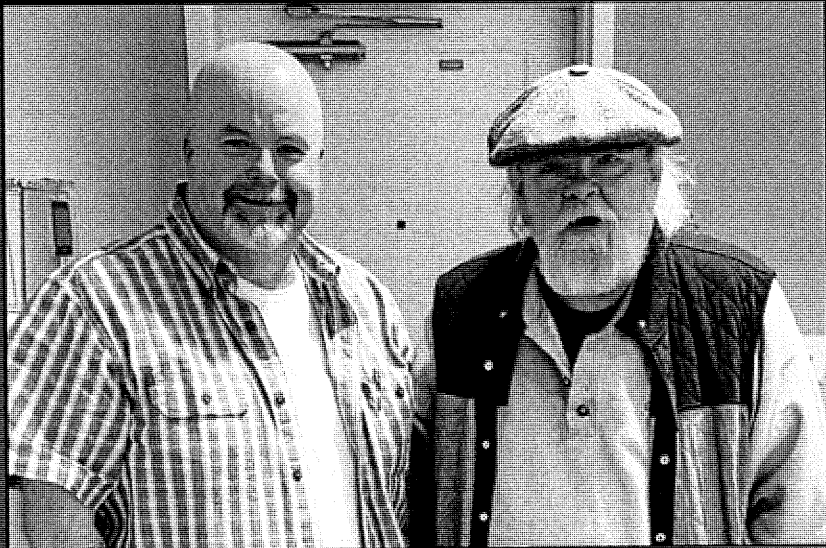


Wizard Tower Games

2d · 🌐



Today sat down with Tim Kask to do the final recordings for D20 Delving. The process went faster than we thought, and much better than we thought. Thanks Tim for you kindness, and making D20 Delving so much better.



👤👤👤 ANKUR tabletop role-playing game and 8 others

2 comments · 1 share

Jan 11, 2023 UPDATE



Wizard Tower Games

📅

January 11, 2023

Hello everyone!

We have been busy as three goblins in a burlap bag here. We wanted to give an update as to the project. We are on track for this Friday to get the remaining paperstocks and cardstock for the game from U.S. Customs.

Hello everyone!

We have been busy as three goblins in a burlap bag here. We wanted to give an update as to the project. We are on track for this Friday to get the remaining paperstocks and cardstock for the game from U.S. Customs.

Yesterday we made all the final recordings with Tim Kask (See pics) and that went perfect. We could not have asked for it to go better. We are on track currently to make our January shipping of games, and plan to be posting production imagery in an update next week.

We appreciate everyone's support on this, and for those of you who have supported is with a dollar, and want to upgrade to a full game, we are in process of setting that on on the D20 Delving Website, and that should be up this weekend. We will link in an update once that happens.



#4 My shop was broken into. Here are the pictures



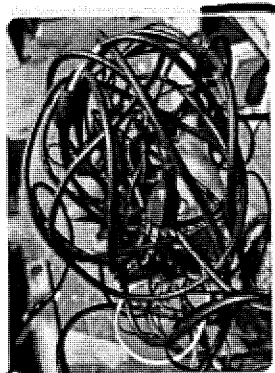
Apr 11, 2022 3:56:44 PM

Text Message



Apr 11, 2022 6:33:22 PM

iMessage



Apr 11, 2022 9:20:37 PM

+ Show More





#4 My shop was broken into. Here are the pictures



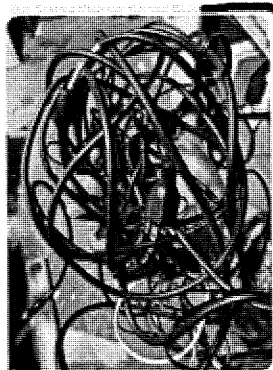
Apr 10, 2022 3:55:44 PM

Text Message

hey i don't know anybody or nothing but i'm sorry i
don't you think about the case i'm sorry
one of them fucking knuckleheads over there i don't
know they are all blown company

Apr 11, 2022 9:13:23 PM

iMessage



Apr 11, 2022 9:10:37 PM

+ Show More

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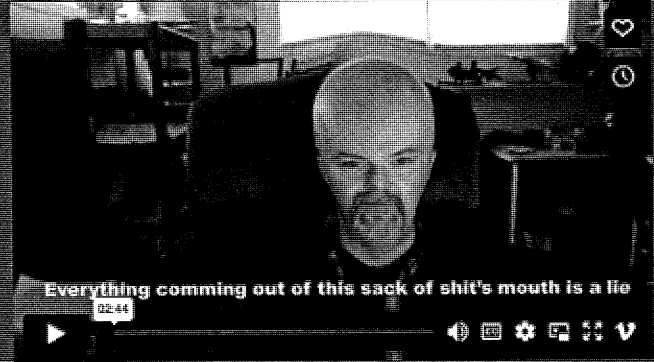
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Operating system:	Windows_NT (Node 16.17.1)
PDF length:	4
Capture ID:	1fgawhF42sss9eDuRzCvJY
User:	dwt-jimbudig

DON O. SEMORA EVADES THE TRUTH BY REDIRECTING



Don O. Semora

If your orders were postponed for unforeseen circumstances, or he was sick, his daughter was deathly ill, or his business was broken into, you have been "SEMORAD."



Don O. Semora

We feel for all the victims of Don O. Semora's deceptions.

IMAGES OF DON O. SEMORA'S DEVASATION

A collage of images related to the scammer alert. At the top, a large banner reads "SCAMMER ALERT" in bold white letters on a black background, with "WARNING" repeated in a pattern. Below the banner are two circular profile pictures: one of Don Semora and one of Scott Lowell. Below these are two rectangular images: one showing a social media post for Don Semora and another for Scott Lowell. At the bottom, there is a row of small thumbnail images, likely screenshots of social media posts or forum discussions. A text box in the center of the collage reads: "BE ADVISE... DON SEMORA IS USING A SECOND ACCOUNT NAMED SCOTT LOWELL TO GO IN GROUPS HE IS BANNED FROM TO SPY, SEND NASTY PRIVATE MESSAGES, MAKE THREATS AND GIVE HIMSELF GOOD REVIEWS ON HIS OWN PROP PAGE OR ON FORUM AND FACEBOOK GROUPS."

PROP PAGE OR ON FORUM AND FACEBOOK GROUPS.

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Space_2 (jpg)

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The information appearing on this website is for general informational purposes only and is not intended to provide legal advice to any individual or entity. We urge you to consult with your own legal advisor before taking any action based on information appearing on this site or any site to which it may be linked.



Exhibit C




Wizard Tower Games

Our first game is the classic, whimsical, and colorful *Wizard Tower*, a game that has been a staple of the Wizard Tower Games collection since its inception.

After a decade of development, we are proud to announce the release of our first game, *Wizard Tower*, a game that has been a staple of the Wizard Tower Games collection since its inception.

11

 **Justin LaNasa**
Donald got me for 23k plus damages. He has caused a lot of others in the publishing/game industry a lot of strife, confusion, and injury. Don't worry; my case on Somera is still pending, and he will see the scales of justice very soon.

References

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Exhibit D



Suite 3300
920 Fifth Avenue
Seattle, WA 98104-1610

Lauren Rainwater
206-757-8119 tel
206-757-7358 fax

laurenrainwater@dwt.com

June 20, 2023

Via Email

Algernon L. Butler III
Butler & Butler, L.L.P
P.O. Box 38
Wilmington, NC 28402
albutleriii@butlerbutler.com

Re: *TSR LLC Violating Protective Order in TSR LLC v. Wizards of the Coast LLC*
Case No. 2:21-cv-01705-SKV (W.D. Wash.)

Dear Mr. Butler:

I represent Wizards of the Coast LLC in litigation involving TSR LLC, Justin LaNasa, and the Dungeon Hobby Shop Museum, Case No. 2:21-cv-01705-SKV (W.D. Wash.). This litigation has been stayed due to TSR LLC's pending bankruptcy petition. *See* 2:21-cv-01705, Dkt. 57. I write to inform you of violations of a protective order entered in that litigation and Wizards' intent to enforce that order. I have copied on this communication Dayna Christian, Nicole McMillan, and Russell Nugent, counsel for TSR LLC and the affiliated parties (the "LaNasa Parties") in the Western District of Washington case.

In November 2022, well before TSR LLC filed its bankruptcy petition, the Western District of Washington court entered the parties' Stipulated Protective Order Governing Conduct. *See* 2:21-cv-01705, Dkt. 47. I have attached that Order as Exhibit A to this letter for your ease of reference. Under that Order, parties are barred from "any direct or indirect conduct to improperly influence testimony or participation in this lawsuit," including

- any public, limited audience, or private statements intended to or likely to have the effect of harassing, intimidating, threatening, or otherwise improperly influencing Witnesses or a Party in this litigation;
- the actual or threatened dissemination of any personal information about Witnesses or a Party, including information of a personal nature regardless of whether it may be available in the public domain;
- use of a Witness's or a Party's name or likeness in a derogatory or harassing manner;
- false and intentionally harassing reports to law enforcement about a Witness or a Party;

DWT.COM

June 20, 2023

Page 2

- solicitation, encouragement, or suggestion for others to perform any conduct barred by this Protective Order; and
- any other behavior intended to or likely to have the effect of improperly influencing a Witness or a Party.

Wizards sought and the parties ultimately stipulated to this Order after third-party witnesses and subpoena recipients Don Semora and Michael Hovermale were subjected to harassing and threatening posts online and in direct communications. Among other things, Mr. Semora was the subject of a highly harassing website, donosemora.com. This website publicized personal information about Mr. Semora and disparaged him and his businesses. As counsel for Wizards, I contacted the LaNasa Parties' counsel regarding this website and other harassment occurring in September and October 2022. Although Ms. Christian would not state directly whether the LaNasa Parties were behind the donosemora.com website and the full range of harassing behavior targeting Mr. Semora and Mr. Hovermale, the website and offending posts were taken down by or at the direction of the LaNasa Parties following communication with counsel. I have attached as Exhibit B to this letter selected correspondence between counsel demonstrating this history.

To Wizards' knowledge, these harassing activities ceased for some time in compliance with the Order. However, since TSR LLC filed for bankruptcy on June 8, it appears that the perpetrators of the witness intimidation and harassment have resumed their behavior. The donosemora.com website is back up as of June 14 or earlier. Anonymous posts on Facebook have directed users to that site, referring to Mr. Semora as a "grifter." And Mr. LaNasa, posting on his own account, wrote that Mr. Semora "has caused a lot of others in the publishing/game industry a lot of strife, confusion, and injury," threatening that "he will see the scales of justice very soon." I have attached as Exhibit C to this letter examples of this behavior, captured by my law firm or sent to us by Mr. Semora.

Wizards takes extremely seriously these efforts to harass and intimidate witnesses in the Western District of Washington case, which directly violate the court's Order and offend the judicial process. As I'm sure you are aware, all laws remain effective in bankruptcy as they do at any other time. 28 U.S.C. § 959(b). We therefore intend to seek to enforce this Order.

We request that you (1) inform your client TSR LLC, and Mr. LaNasa as its principal, that the Protective Order in the Western District of Washington remains effective and bars activities intended to or likely to have the effect of harassing, intimidating, threatening, or otherwise improperly influencing witnesses in that case. Please also (2) direct Mr. LaNasa to remove the offending materials and cease any further activities of this nature, or, if appropriate, to direct his associates to do the same. Finally, we request (3) that you let us know your position regarding whether the bankruptcy stay precludes a motion to enforce the Order in the Western District of Washington. While we intend to seek the Bankruptcy Court's confirmation of our procedural rights, we would appreciate knowing whether you would oppose on the basis of the stay such a filing in the Western District of Washington case.

June 20, 2023
Page 3

We request your response on the first two items in the paragraph above by June 22, and your answer regarding the stay by June 28.

Sincerely,

Davis Wright Tremaine LLP

A handwritten signature in cursive script, appearing to read "Lauren Rainwater".

Lauren Rainwater

Encl.

Cc: Dayna Christian
Nicole McMillan
Russell Nugent

Exhibit B

Almeida, MaryAnn

From: Dayna Christian <Dayna.Christian@immixlaw.com>
Sent: Thursday, October 20, 2022 12:17 PM
To: Rainwater, Lauren; Almeida, MaryAnn
Cc: Nicole McMillan; Russell Nugent; Dunwoody, Stuart; McCarty, Rose
Subject: RE: Today's hearing

[EXTERNAL]

Lauren,

You are not entitled to convert our email communications into any kind of admission. If you have some legal basis to support your position, please share it.

From: Rainwater, Lauren <LaurenRainwater@dwt.com>
Sent: Thursday, October 20, 2022 11:10 AM
To: Dayna Christian <Dayna.Christian@immixlaw.com>; Almeida, MaryAnn <MaryAnnAlmeida@dwt.com>
Cc: Nicole McMillan <Nicole.McMillan@immixlaw.com>; Russell Nugent <russell@kinglawonline.com>; Dunwoody, Stuart <stuartdunwoody@dwt.com>; McCarty, Rose <RoseMcCarty@dwt.com>
Subject: RE: Today's hearing

[This message is from an external sender]

Dayna,

Your refusal to answer the question of whether your client is behind the Donosemora.com website is a tacit admission that your client created the website. If your client did not create the website, please simply state that. If you continue to refuse to answer this question, we will take that as an admission that your client created the website. This will come up in depositions either way, so I don't understand your refusal to answer the question.

Neither MaryAnn nor I identified Mr. Semora and Mr. Hovermale as "WOTC representatives" during the hearing. The courtroom deputy made that statement, and I do not know why she made that statement. We had no knowledge that they would be attending the hearing, and we never would have characterized them as representatives of Wizards of the Coast. I reiterate again, Mr. Semora and Mr. Hovermale are not representatives or affiliates of Wizards of the Coast, and we do not represent them. The Court expressly acknowledged these facts during the hearing. While she cautioned them to not engage in the behavior that was the subject of the hearing, she acknowledged that they would not be bound by the protective order.

If you somehow believe that DWT or Wizards of the Coast is responsible for the conduct of Mr. Semora or Mr. Hovermale, please explain the basis for your position so that we may address it with the Court, if needed.

Lauren Rainwater | Davis Wright Tremaine LLP
920 Fifth Avenue, Suite 3300 | Seattle, WA 98104-1610
Tel: (206) 757-8119 | Fax: (206) 757-7119
Email: laurenrainwater@dwt.com | Website: www.dwt.com

Anchorage | Bellevue | Los Angeles | New York | Portland | San Francisco | Seattle | Washington, D.C.

From: Dayna Christian <Dayna.Christian@immixlaw.com>
Sent: Thursday, October 20, 2022 10:53 AM
To: Rainwater, Lauren <LaurenRainwater@dwt.com>; Almeida, MaryAnn <MaryAnnAlmeida@dwt.com>

Cc: Nicole McMillan <Nicole.McMillan@immixlaw.com>; Russell Nugent <russell@kinglawonline.com>; Dunwoody, Stuart <stuartdunwoody@dwt.com>; McCarty, Rose <RoseMcCarty@dwt.com>
Subject: RE: Today's hearing

[EXTERNAL]

Lauren,

Please do not make any assumptions about my prior email – I was very clear and made no such acknowledgement.

At the beginning of the hearing, the unidentified callers were reported to the Court to be “WOTC representatives” by either you or MaryAnn (I can’t recall which of you made that representation to the Court). Later in the hearing, when the callers were required to identify themselves, Mr. Hovermale reported that he was attending “on behalf of WOTC” or something to that extent. I believe Mr. Semora made the same representation.

The Court was careful to not only address Mr. Hovermale and Mr. Semora directly, but also to ensure that the draft PO included all direct and indirect actions by any party and to include all affiliates of any party. Based on the introduction of the callers and their own introductions to the Court, it was made clear that both men are affiliates of WOTC.

Please let me know if you disagree. Maybe it won’t matter at all if no one violates the Court’s instructions.

Thanks.

From: Rainwater, Lauren <LaurenRainwater@dwt.com>

Sent: Wednesday, October 19, 2022 4:54 PM

To: Dayna Christian <Dayna.Christian@immixlaw.com>; Almeida, MaryAnn <MaryAnnAlmeida@dwt.com>

Cc: Nicole McMillan <Nicole.McMillan@immixlaw.com>; Russell Nugent <russell@kinglawonline.com>; Dunwoody, Stuart <stuartdunwoody@dwt.com>; McCarty, Rose <RoseMcCarty@dwt.com>

Subject: RE: Today's hearing

[This message is from an external sender]

Hi Dayna,

I will take your answer below as an acknowledgement that your client created the Donosemora.com website. Please correct me if that is inaccurate.

We appreciate that you have instructed your client to immediately comply with the Court’s instructions today. Wizards of the Coast has never engaged in the conduct discussed today, and it will continue refraining from such conduct in accordance with the Court’s instructions.

With respect to conduct by Mr. Semora and Mr. Hovermale, as you know, I do not represent them and they are not parties to this lawsuit. As such, they are not bound by the forthcoming protective order, and I have no ability to control their actions. However, both were present during the hearing, and I anticipate they will act in accordance with the Court’s instructions.

Lauren Rainwater | Davis Wright Tremaine LLP

920 Fifth Avenue, Suite 3300 | Seattle, WA 98104-1610

Tel: (206) 757-8119 | Fax: (206) 757-7119

Email: laurenrainwater@dwt.com | Website: www.dwt.com

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From: Dayna Christian <Dayna.Christian@immixlaw.com>

Sent: Wednesday, October 19, 2022 4:28 PM

To: Rainwater, Lauren <LaurenRainwater@dwt.com>; Almeida, MaryAnn <MaryAnnAlmeida@dwt.com>

Cc: Nicole McMillan <Nicole.McMillan@immixlaw.com>; Russell Nugent <russell@kinglawonline.com>; Dunwoody, Stuart <stuartdunwoody@dwt.com>; McCarty, Rose <RoseMcCarty@dwt.com>

Subject: RE: Today's hearing

[EXTERNAL]

Lauren,

I'm told that the video is now down.

I not aware of any intention for the Don Semora website to be live while this case is pending.

I have no idea who may have sent the Anonymousemails to Don Semora and/or Michael Hovermale but I believe that my client is being truthful when he says that it was not him.

Mr. Griffin is a known affiliate of Don Semora and Michael Hovermale. My client and I were not aware of the claim that "Liam Bombardo" is actually Mr. Griffin and question whether that's an accurate claim. Regardless, I trust that the Court's admonition to all parties and witnesses will extend to "indirect" activities such as those of Mr. Griffin.

I've instructed my client to consider the Court's instructions for our pending Protective Order as a directive for immediate compliance. That would include the subjects raised in your email below. I trust you've done the same on your end.

Thank you.

From: Rainwater, Lauren <LaurenRainwater@dwt.com>

Sent: Wednesday, October 19, 2022 1:15 PM

To: Dayna Christian <Dayna.Christian@immixlaw.com>; Almeida, MaryAnn <MaryAnnAlmeida@dwt.com>

Cc: Nicole McMillan <Nicole.McMillan@immixlaw.com>; Russell Nugent <russell@kinglawonline.com>; Dunwoody, Stuart <stuartdunwoody@dwt.com>; McCarty, Rose <RoseMcCarty@dwt.com>

Subject: RE: Today's hearing

[This message is from an external sender]

Dayna,

I mentioned the below video, which is still available on YouTube:

<https://www.youtube.com/watch?v=p7GuDLkdCVg&t=1s>

Thank you for your attention in having that removed.

Could you please confirm whether your clients or any of their family members or associates are behind the Donosemora.com website? If so, please confirm that the website will be permanently taken down.

Could you also please confirm whether your clients or any of their family members or associates sending anonymous emails to Mr. Semora or Mr. Hovermale or anonymously sending mass emails regarding those individuals? If so, please confirm this behavior will stop.

With respect to the Liam Barbardo account name, I have been contacted by a gentleman named Scott Griffin who confirmed that is his account. I also understand that Mr. Lanasa was aware Mr. Griffin was behind that account and that all of the messages between them were private—not publicly posted.

Lauren Rainwater | Davis Wright Tremaine LLP

920 Fifth Avenue, Suite 3300 | Seattle, WA 98104-1610
Tel: (206) 757-8119 | Fax: (206) 757-7119
Email: laurenrainwater@dwt.com | Website: www.dwt.com

Anchorage | Bellevue | Los Angeles | New York | Portland | San Francisco | Seattle | Washington, D.C.

From: Dayna Christian <Dayna.Christian@immixlaw.com>

Sent: Wednesday, October 19, 2022 12:30 PM

To: Rainwater, Lauren <LaurenRainwater@dwt.com>; Almeida, MaryAnn <MaryAnnAlmeida@dwt.com>

Cc: Nicole McMillan <Nicole.McMillan@immixlaw.com>; Russell Nugent <russell@kinglawonline.com>

Subject: Today's hearing

[EXTERNAL]

Lauren –

During the hearing today you mentioned that there were things that you found online that were still live as of this morning that you expected to have been taken down. I didn't write fast enough to note what those were. Can you please remind me and I'll get those addressed?

Thank you,

Dayna J. Christian | Attorney

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dayna.christian@immixlaw.com

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